

1 UNITED STATES DISTRICT COURT  
2 WESTERN DISTRICT OF PENNSYLVANIA

3 UNITED STATES OF AMERICA,

Case No. 2:22-CR-00077 JFC

4  
5 Plaintiff,

6 v.

7 TERRY TABOR,

8 Defendant.  
9

10 **DEFENDANT'S SUPPLEMENTAL CHARACTER LETTERS**

11 To supplement his sentencing memorandum, ECF No. 68, Defendant Terry Tabor  
12 asks the Court to accept the attached letters and consider them during his forthcoming  
13 sentencing. With apologies to the Court and the prosecution—and despite the efforts of Mr.  
14 Tabor's counsel—these authors offered the attached letters, in their current formats, after Mr.  
15 Tabor already filed his sentencing memorandum with the Court.  
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18 RESPECTFULLY submitted this 27th day of March, 2023.

19 /s/ Shaheen P. Torgoley  
20 Shaheen P. Torgoley, Esq.  
21 Ryan Rapp Pacheco & Kelley, PLC  
22 3200 N. Central Ave., Suite 2250  
Phoenix, AZ 85012

23 /s/ Samir Sarna  
24 Samir Sarna  
25 Worgul, Sarna & Ness, LLC  
26 429 Fourth Avenue, Suite 1700  
Pittsburgh, PA 15219

27 Attorneys for Terry Tabor

1 Original of the foregoing served by way of CM/ECF Electronic Filing this 27th day of  
2 March, 2023.

3 By: Shaheen P. Torgoley



Dear Honorable Judge Flowers,

My name is Chad Hallahan and I have been the store manager at Tandem Tire & Auto in Dubuque, IA for the last 22 years.

I am writing on behalf of my friend Terry Tabor. I have known Terry for over 10 years.

I was troubled and surprised to hear about Terrys recent case as he has always been rather solid person.

It is for this reason I am happy to write a letter of reference for Terry Tabor regarding this matter.

I understand the seriousness of this matter. However, hope the court will show some leniency.

While it is unfortunate that Terry has made some bad decisions.

I believe that as we move forward, Terry will emerge a better person. In short Terry expressed deep sense of remorse in making such a serious mistake and I believe in his ability to pay his dept to society.

It's my sincere hope the court takes this letter into consideration at the time of sentencing.

I still believe Terry to be an honorable individual and a good human being.

Sincerely,

Chad Hallahan

**From:** [Marty Hammer](#)  
**To:** [Shah Torgoley](#)  
**Subject:** Letter of character reference " Terry Tabor  
**Date:** Friday, March 24, 2023 4:44:49 PM

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Your Honor,

My name is Marty Hammer and I am writing a character reference on behalf of Mr Terry Tabor.

A little about me , I'm a fellow union member of the local 181 operators union along with Mr Tabor in good standing for the past 10 years, I have a wife and three children whom have met and spent time with Mr Tabor in our home, I'm also a retired veteran of the army national guard serving in Desert Storm and as recently OIF III until retirement in 2013, I'm a homeowner and gainfully employed in the construction field and my wife is a tenured elementary school teacher.

I have known Mr Tabor these past 10 years and worked and lived next to him as we worked jobs traveling around the country and have remained in constant contact as the jobs opportunities came available as traveling pipeline operators, I've never known Mr Tabor but as an honorable , hard working ,sober, trustworthy friend to me and those around him, always punctual , willing to help others in need . I would welcome in my home anytime and would ask for any leniency afforded to your judgment. Thank Your for your time , consideration and service.

Sincerely,

Marty Hammer

Sent from my iPhone

**From:** [Courtney Cowart](#)  
**To:** [Shah Torgoley](#)  
**Subject:** Terry Tabor  
**Date:** Tuesday, March 21, 2023 9:43:09 AM

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Please find attached letter for Judge Flowers Conti on behalf of Terry Tabor.

The Honorable Judge Flowers Conti,

I have known Terry Tabor since 2006. I met him on a pipeline job in Pennsylvania. He knows a lot about pipelining from running different types of machinery to setting pipe, stringing pipe, and lowering pipe in the ground. He is well known and respected throughout the pipeline community for his hard work, helpful personality, giving heart, and all around great spirit. If it would not have been for Terry, I would have never received my Union book. He has helped me obtain much employment and I have had the pleasure to work with him on many jobs. Terry is a very smart, gifted pipeliner and an outstanding member of the Union.

Terry has spent much time in my home with my family. He has attended many special events with my family. My children fondly refer to him as "Uncle Terry".

Please have kindness in your heart when it comes to Terry Tabor for he is a good man with a heart of gold.

Kind regards,

Jason Craig & family